

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2016 DEC -7 PM 12: 58

UNITED STATES OF AMERICA

v.

GAVIN FRIEDMAN

Defendant.

SA 16 CR 889 DAE
Criminal No: SA 16-CR-889
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEPUTY CLERK

INDICTMENT

[Vio: 18 U.S.C. §871(a): Threat to President
18 U.S.C. § 844(e): Mail Concerning
An Explosive;
18/876(c): Mailing Threatening Communi-
cations].

The Grand Jury Charges:

COUNT ONE

Threat Against President
(Violation of 18 U.S.C. § 871(a))

On or about January 22, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of the President of the United States, Barack Obama, and specifically stating that Obama will be killed so that the defendant can be martyred in the name of Allah.

In violation of 18 U.S.C. § 871(a).

COUNT TWO
Threat Against President
(Violation of 18 U.S.C. § 871(a))

On or about April 3, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of the President of the United States, Barack Obama, and specifically stating that he is going to assassinate Obama because Obama “ is a puppet for (ZOG) Zionist Organized Government.”

In violation of 18 U.S.C. § 871(a).

COUNT THREE
Mailing – Concerning An Explosive
(Violation of 18 U.S.C. § 844(e))

On or about September 19, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of an instrument of interstate and foreign commerce, that is, the mail, did willfully make a threat, and did maliciously convey false information knowing the same to be false concerning an attempt to be made, to unlawfully damage and destroy a building, that is, the Federal Bureau of Investigation Field Office in Houston, and the White House in Washington, D.C., by means of an explosive.

A violation of 18 U.S.C. § 844(e).

COUNT FOUR
Threat Against President
(Violation of 18 U.S.C. § 871(a))

On or about September 19, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of, and to inflict harm upon, the President of the United States, Barack Obama, and specifically stating, "I am going to kill him He is a dead [expletive]."

In violation of 18 U.S.C. § 871(a).

COUNT FIVE
Mailing Threatening Communications
(Violation of 18 U.S.C. § 876(c))

On or about September 19, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly deposit in an authorized depository for mail, to be sent and delivered by the Postal Service, a communication addressed to the United States Attorney for the Western District of Texas, and containing a threat to injure the United States Attorney, a Federal law enforcement official employed by the Department of Justice, and specifically stating that he is going to kill the United States Attorney and kidnap and kill the United States Attorney's family.

In violation of 18 U.S.C. § 876(c).

COUNT SIX
Threat Against President
(Violation of 18 U.S.C. § 871(a))

On or about September 27, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of the President of the United States, Barack Obama, and specifically stating, "I am going to kill him that stupid [expletive]."

In violation of 18 U.S.C. § 871(a).

COUNT SEVEN
Mailing Threatening Communications
(Violation of 18 U.S.C. § 876(c))

On or about September 27, 2016, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly deposit in an authorized depository for mail, to be sent and delivered by the Postal Service, a communication addressed to the United States Attorney for the Western District of Texas, and containing a threat to injure the United States Attorney, a Federal law enforcement official employed by the Department of Justice, and specifically stating that he has hired people to kill the United States Attorney and to kidnap the United States Attorney's family.

In violation of 18 U.S.C. § 876(c).

A TRUE BILL


FOREPERSON

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